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ABSTRACT

Deposition of Roger Ludwick
11/8/94
Cincinnati, Ohio
Skinner Landfill Site

Mr. Ludwick has spent most of his life working in the Cincinnati area. By trade he is a diesel mechanic, and as an employee of A Okay Leasing, from 1967 through 1970, he cared for trucks, tankers, and trailers of Keenan Oil. During this period, he observed Keenan Oil dumping residue creosote oils into the Skinner Landfill. He explained that the Skinners had built a lagoon at the landfill specifically for this kind of dumping. This is also the period when he became most familiar with the Skinners and when John Skinner employed him to perform various projects at the Skinner Landfill.

John Skinner hired Ludwick to help distribute and bury waste at the site. Most of the operations took place at night, and usually, only John Skinner and Ludwick were present at these operations. During this period, Elsa and Albert Skinner ran the Landfill by day along with Ray Scarra, John Skinner's half brother. Ludwick never drove any trucks for the Skinners, but knew others who had, including a Mr. James Hurley, who owned his own moving company called Sicking Moving Company. Ludwick worked for John Skinner until 1982, when John died in a bulldozer accident.

One of the Skinner's most important clients, during this period was Chem-Dyne, located in Hamilton, Ohio. Chem-Dyne sent mainly waste glycol antifreeze solution to the Skinner Landfill. Ludwick repeatedly mentioned a Mr. Kovacs in association with Chem-Dyne. He stated that Kovacs likely acted as the manager of the waste transfer operations from Chem-Dyne to the Skinner Landfill. Ludwick also stated that a Mr. Bruce Whitton may have worked with Kovacs in directing these affairs.

Ludwick described numerous occasions where John and Ray Skinner personally hauled Chem-Dyne waste to the Skinner Site. John Skinner would not necessarily communicate with someone at Chem-Dyne each time he went to pick up a shipment. Rather, Chem-Dyne and the Skinners had pre-arranged a schedule where Kovacs would tell the Skinners where he kept his trucks and trailers in advance. On a given night, John Skinner often made multiple trips.

Discussion then turned to an incident where Martin Marrietta, of Marrietta, Ohio, sent two 40-foot long, 10-foot in diameter tanks filled with phenol solution to the Skinner Landfill by rail car for disposal. The phenol tanks weighed approximately 50 tons and transporting the phenol required a 100 ton mon-o-war crane. The phenol tanks were rusty and had no discernable identifying marks. However, Ludwick felt certain that these tanks came from Martin Marrietta. Another individual named Rodney Miller also helped dispose of these phenol tanks.

Ludwick emphasized that the phenol solution was extremely toxic. John Skinner acquired a phenol bacteria infection in the

process of transporting and dumping the phenol. Ludwick also related that he had heard a story of an engineer who had gotten some of the phenol solution in his mouth died within a matter of minutes. The Skinners dumped this phenol solution into the solid waste portion of the Skinner Landfill (not the lagoon) because John Skinner believed that this was safer practice and that nothing would leak through the solid waste area. Typically, John would excavate a hole in the solid waste part of the landfill in which to bury more dangerous liquid materials, rather than dump them in the lagoon. Materials that he felt were less dangerous, he would simply pump into the lagoon. In this incident, the 50-ton tanks of phenol were buried next to the smaller trilobite pond used as a repository for Keenan's creosote waste oil at the lower part of the Landfill. Only dirt and sand surrounds the tanks, and Ludwick emphasized that when the tanks deteriorate, the phenol will drain directly into the soil, the pond, and the groundwater.

Ludwick next discussed how he helped the Skinners demolish the Armor fertilizer building in St. Bernard and haul waste from that demolition to the Skinner Landfill. The Armor Fertilizer Building was owned by Bill Schmit. Bill Schmit and his partner, Jim Slemp, bought the Armor Fertilizer building, and hired Skinner to demolish the building so they could use the land for other purposes.

In April 1976 EPA and OhioEPA inspected the Skinner Site. On this occasion, John hired Ludwick to keep other parties and onlookers out of the site while the inspection took place.

During and prior to the inspection, John instructed Ludwick to destroy the Skinner's trailer truck license plates. Ludwick was also employed to help cover the lagoon. To do so, John had Ludwick dump empty barrels and wrecked cars into the lagoon to help cover it. John also employed a Mr. John Bushelman, who the Skinners originally employed to excavate the trilobite pond, to bulldoze wrecked cars into the lagoon to help cover it. This elaborate bulldozing and covering process took approximately two days.

Questioning then turned to Frank Adams & Comany. Frank Adams & Company provided special trailer trucks which John, with the help of Ludwick, used to haul large storage tanks used for compressed air. Nothing was in these tanks. However, the tanks were partly made of copper and they had Parolite as insulation. These materials were normally separated, recycled, and not dumped at the site. However, there was a possibility that some waste from these tanks were burried at the Landfill.

Questioning then turned to the Borden Company. Borden employed Skinner to remove Borden's chemical waste. Skinner usually took materials from Borden in barrels, and either poured the chemicals into the lagoon and sold the metal barrels for scrap or recycled them.

Finally, Ludwick answered general questions about whether and what various other companies dumped at the Skinner Landfill.

He stated:

1. Aeronco and Acme Wrecking Company dumped concrete.
2. Dow Chemical may have dumped chemical drums.
3. King Wrecking hauled concrete and other demolition waste.
4. Kroeger dumped meat and poultry animal waste.
5. Coastal Tank Lines hauled waste oil to the site for Keenan.
6. Proctor and Gamble dumped some waste materials from their research and development division, waste material which caught fire at the site. Additionally, Proctor and Gamble dumped large shipments of damaged Prell Shampoo.
7. The U.S. Army disposed of hand grenades, other ammunitions, and sheets of fiberglass.
8. He had seen Richard Clark at the site and stated that there was a strong possibility Clark dumped waste at the site.
9. Estes Oil dumped tree stumps and concrete.
10. Monsanto, Morton International, O'rourke Wrecking, and NCR dumped miscellaneous waste at the landfill.
11. Anchor-Hocking bought out part of Keenan Oil in the early 1970s. Anchor-Hocking and Keenan Oil are still in business and primarily process and recycle waste oil. Keenan Oil chemist, Tim Wolf, might have more information about what Keenan had actually dumped.